

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Caption in Compliance with D.N.J. LBR 9004-2©
Novlet Lawrence, Esq. (NL6166)
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In Re:

876 Stuyvesant Realty, LLC
Debtor

Case No.: 24-12302VFP

Judge: VFP

Chapter: 11

APPLICATION FOR RETENTION OF PROFESSIONAL

1. The applicant, 876 Stuyvesant Realty, LLC, is the (check all that apply):

☐ Trustee: ☐ Chap. 7 ☐ Chap. 11 ☐ Chap. 13.

☐ Debtor: ☒ Chap. 11 ☐ Chap. 13

☐ Official Committee of _____

2. The applicant seeks to retain the following professional Novlet Lawrence, Esq. to
serve as (check all that apply):

☒ Attorney for: ☐ Trustee ☒ Debtor-in-Possession

☐ Official Committee of _____

☐ Accountant for: ☐ Trustee ☐ Debtor-in-possession

☐ Official Committee of _____

☐ Other Professional:

☐ Realtor

☐ Appraiser

☐ Special Counsel

☐ Auctioneer

☐ Other (specify): _____

3. The employment of the professional is necessary because:

The debtor is a limited liability company and cannot represent itself, hence, the debtor needs an attorney to represent its interest.

4. The professional has been selected because:

The principal owner has known the attorney for a number of years and the attorney has been its and the principal owner's counselor in various matters over the years. Further, the attorney's general practice of over 30 years includes that of bankruptcy law.

5. The professional services to be rendered are as follows:

All necessary and appropriate legal services in the administration of debtor's Chapter 11 case, including but not limited to advise the Debtor of its rights, powers, and duties as a debtor-in possession, and assist with its debt restructuring

6. The proposed arrangement for compensation is as follows:

Flat fee of \$10,000.00, except that services rendered after the filing of a Chapter 11 Plan will be billed at an hourly rate of \$450.00 per hour.

7. To the best of the applicant's knowledge, the professional's connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe connection: The attorney has been counselor and advisor to the debtor in various matters including real estate foreclosure and bankruptcy over the years.

8. To the best of the applicant's knowledge, the professional (check all that apply):

☒ does not hold an adverse interest to the estate.

☒ does not represent an adverse interest to the estate.

☒ is a disinterested person under 11 U.S.C. § 101(14).


☒ does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).

☐ Other; explain: _____

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: N/A

The applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may determine and allow.

Date: 3/1/2024


/s/Dennis Brown
Signature of Applicant

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Caption in Compliance with D.N.J. LBR 9004-1(B)

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CASE#: 24-12302 VFP

Judge: VFP

Chapter 11

In Re:

876 Stuyvesant Realty, LLC

Debtor

**CERTIFICATION OF PROFESSIONAL IN SUPPORT OF
APPLICATION FOR RETENTION OF PROFESSIONAL**

I, Novlet Lawrence, Esq., being of full age, certify as follows:

1. I am seeking authorization to be retained as counsel for the debtor 876 Stuyvesant Realty, LLC.
2. My professional credentials include: I am an attorney at law involved in the general practice of law, including bankruptcy law for over 30 years. I have represented clients in several chapter 11 single asset real estate bankruptcy filings in the past.
3. I am a sole practitioner in my firm: Novlet Lawrence Law Office, with a current address of PO Box 436 Whitehouse Station, NJ 08889.
4. The proposed arrangement for compensation, including hourly rates, if applicable, is as follows: Flat fee of \$10,000.00, except that services rendered after the filing of a Chapter 11 Plan will be billed at an hourly rate of \$450.00 per hour.

X ☐ Pursuant to D.N.J. LBR 2014-3, I request a waiver of the requirements of D.N.J. LBR 2016-1.

5. To the best of my knowledge, after reasonable and diligent investigation, my connection with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as

follows:

☒ None

☐ Describe connection: __N/A

6. To the best of my knowledge, after reasonable and diligent investigation, the connection of my firm, its members, shareholders, partners, associates, officers and/or employees with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☒ None

☐ Describe Connection: I have provided general legal advise to the debtor's principal owner/member in the past

7. To the best of my knowledge, my firm, its members, shareholders, partners, associates, officers and/or employees and I (check all that apply):

☒ do not hold an adverse interest to the estate.

☒ do not represent an adverse interest to the estate.

☒ are disinterested under 11 U.S.C. § 101(14).

☒ do not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which I will be retained under 11 U.S.C. § 327(e).

☒ Other. Explain: __N/A__

8. If the professional is an auctioneer,

The following are my qualifications and experience with the liquidation or sale of similar property: N/A

b. The proposed method of calculation of my compensation, including rates and formulas, is: __N/A__

Pursuant to D.N.J. 2014-2, I ☒ do, or ☐ do not request a waiver of the requirements of

D. N. J. LBR 2016-1.

c. The following is an estimate of all costs and expenses, including labor, security, advertising, delivery, mailing, and insurance, for which I will seek reimbursement from the sale proceeds: N/A

d. Have you, or a principal of your firm, been convicted of a criminal offense?


☒ No ☐ Yes (explain below)

e. I certify that a surety bond as described in D. N. J. LBR 2014-2(a)(6) is in effect and will remain so through the date of turnover of the auction proceeds. N/A

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: N/A

I certify under penalty of perjury that the above information is true.

Date: 3/1/2024



Novlet Lawrence, Esq.
Signature of Professional

rev.8/1/15

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DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

NOVLET LAWRENCE
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Phone: (973) 677-3330
lawrencenovlet@aol.com
Attorney for Debtor

In Re:

876 STUYVESANT REALTY, INC

Case No.: _____

Chapter: _____

Chapter 11

Judge: _____

ORDER AUTHORIZING RETENTION OF

NOVLET LAWRENCE, ESQ,

The relief set forth on the following page is **ORDERED**.

Upon the applicant's request for authorization to retain Novlet Lawrence, Esq.
as attorney for the debtor, it is hereby ORDERED:

1. The applicant is authorized to retain the above party in the professional capacity noted.
The professional's address is: PO Box 436
Whitehouse Station, NJ 08889
2. Compensation will be paid in such amounts as may be allowed by the Court on proper application(s).
3. If the professional requested a waiver as noted below, it is ☐ Granted ☐ Denied.
☒ Waiver, under D.N.J. LBR 2014-2(b), of the requirements of D.N.J. LBR 2016-1.
☐ Waiver, under D.N.J. LBR 2014-3, of the requirements of D.N.J. LBR 2016-1 in a chapter 13 case. Payment to the professional may only be made after satisfactory completion of services.
4. The effective date of retention is the date the application was filed with the Court.